

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

SPRINT CORPORATION,

Petitioner,

v.

FEDERAL COMMUNICATIONS COMMISSION
and UNITED STATES OF AMERICA,

Respondents.

No. 24-1224

T-MOBILE USA, INC.,

Petitioner,

v.

FEDERAL COMMUNICATIONS COMMISSION
and UNITED STATES OF AMERICA,

Respondents.

No. 24-1225

On Petitions for Review of Orders of
the Federal Communications Commission

**RESPONDENTS' MOTION FOR STAY IN LIGHT OF LAPSE IN
APPROPRIATIONS**

Respondents respectfully move this Court for a stay of this proceeding in light of the current lapse in appropriations by Congress. As the Court is likely aware, on October 1, 2025, appropriations funding

significant portions of the federal government, including the Federal Communications Commission (“FCC”) and the Department of Justice (“DOJ”), expired. As of this writing, no further appropriation by Congress has been made.

Absent a further Congressional appropriation, the United States is required to impose significant restrictions on the ability of many of its employees to carry out their ordinary duties. Specifically, certain DOJ attorneys, agency attorneys, and other employees of the federal government are prohibited from working, even on a voluntary basis, except in very limited circumstances, including “emergencies involving the safety of human life or the protection of property.” 31 U.S.C. § 1342. The lapse in appropriations thus requires a substantial reduction in the workforces of the FCC and DOJ, particularly with respect to the defense of civil cases. This reduction has effectively eliminated the ability of counsel who have worked on and are familiar with this case to handle the litigation while the lapse in appropriations continues.

Under the circumstances, Respondents respectfully request that the Court: (1) stay this proceeding until the restoration of funding to FCC and DOJ; and (2) toll all pending and potential deadlines. We regret the

necessity of this request and thank the Court for its time and consideration.

Dated: October 1, 2025

Respectfully submitted,

/s/ Adam L. Sorensen

D. Adam Candeub
General Counsel

Bradley Craigmyle
Deputy General Counsel

Jacob M. Lewis
Associate General Counsel

Adam L. Sorensen
Counsel

FEDERAL COMMUNICATIONS
COMMISSION

45 L Street NE
Washington, DC 20554
(202) 418-1740
fcclitigation@fcc.gov

*Counsel for Respondent Federal
Communications Commission*

Abigail A. Slater
Assistant Attorney General

Robert B. Nicholson
Matthew A. Waring
Attorneys

U.S. DEPARTMENT OF JUSTICE
ANTITRUST DIVISION
950 Pennsylvania Ave. NW
Washington, DC 20530

*Counsel for Respondent
United States of America*¹

¹ Filed with consent under D.C. Circuit Rule 32(a)(2).

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/s/ Adam L. Sorensen
Adam L. Sorensen
Counsel for Respondent
Federal Communications Commission